

KAREEM E. ABDO, ESQ.

Attorney at Law
260 Madison Avenue, Suite 204
New York, New York 10016
Phone: (646) 286-6472
Fax: (646) 663-3921
E-mail: kareemabdolaw@gmail.com

June 14, 2019

Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY
10007-1312

RE: Weaver v. Cognizant, et al. 19 CV 1310 (GHW)

Dear Judge Woods:

I represent the Plaintiff in the above referenced matter before Your Honor. I write today to request leave to file what would be Plaintiff's first amended complaint to add Jayachandran Indrakumar as a Defendant.

As the Court is aware, Mr. Indrakumar was described in the Complaint (Docket #1) but was not included in the caption due to attorney error. Plaintiff now seeks leave to amend the complaint to include Mr. Indrakumar in the caption and also to briefly describe him. Thus the only changes to the complaint would be the caption, amending three internal paragraph and the addition of one more internal paragraph.

The Rule of Civil Procedure guiding Your Honor's decision is Rule 15(a)(2). The rule states that such leave requested here should be given freely. *Id. See also Benavidez v. Piramides Mayas, Inc.* 2013 U.S. Dist. LEXIS 55586 at 14 (S.D.N.Y. 2013); *Halebian v. Berv*, 869 F. Supp. 2d 420, 434 (S.D.N.Y. 2012); *Tabor v. New York City*, 2012 U.S. Dist. LEXIS 29004 at 8-9 (E.D.N.Y. 2012); *Hines v. City of Albany*, 542 F. Supp. 2d 218, 223 (N.D.N.Y. 2008).

If I may aid Your Honor in determining the appropriateness of this request, please let me know.

Kind regards,

/s/ Kareem E. Abdo, Esq.

Kareem E. Abdo, Esq.

CC: Devjani H. Mishra, Esq
Sean A. Malley, Esq.